

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

**AMERICAN EMPLOYERS' INSURANCE
COMPANY, as subrogee of College Book
Stores of America,**

Plaintiff,

V.

**UNITED DOMINION INDUSTRIES, INC..
THE MARLEY CORPORATION and
MARLEY ENGINEERED PRODUCTS,
SPX CORPORATION AND MARLEY
CORPORATION,**

Defendants/Third-Party Plaintiffs,

V.

T.A. RIETDORF & SONS, INC.,

Third-Party Defendant.

Civil Action No. 04-178

TRIAL BY JURY OF TWELVE DEMANDED

**THIRD PARTY DEFENDANT RIETDORF & SONS
INC.'S 2ND SET OF INTERROGATORIES DIRECTED TO PLAINTIFF**

1. Please identify the manufacturer and trade name or product name, the date of installation and identity of installer of the carpeting in the first floor of bookstore present on the day of the fire.

ANSWER:

2. Please identify the names of all security personnel employed by or on behalf of Widener, who received any alarms on the night of the fire, or who responded to the scene prior to the arrival of the fire company.

ANSWER:

3. Please identify the name of the manufacturer and the identification of the type of alarm systems, including and product or serial numbers of the alarms, present in the bookstore the night of the fire.

ANSWER:

CHRISSINGER & BAUMBERGER

/s/David L. Baumberger

DAVID L. BAUMBERGER, #2420

Three Mill Road, Suite 301

Wilmington, DE 19806

(302) 777-0100

Attorney for Third-Party Defendant

DATED: May 9, 2005